



Chairman Ajit Pai  
Federal Communications Commission  
445 12th Street SW,  
Washington, DC 20554

October 22, 2017

Dear Chairman Pai,

I am writing today in response to the Federal Communications Commission's (FCC) Public Notice which, among other things, considers changes to the E-Rate program. Before delving into my response to the proposed changes, I want to thank the FCC for your continued support for the E-Rate program and for the critical programmatic and policy changes the commission adopted in 2014. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

Casey County School District is a rural school district of 2263 students of which 2149 are NSLP eligible –that's nearly 95% (94.96%). Casey County does not have a large tax base or abundant industry financial support, hence we rely heavily on federal and state flow-through dollars and grants to provide quality education for students living in our county. Despite our socio-economic situation, Casey County Schools is proud to be a top-10 performing district among Kentucky's 173 school districts. E-rate funding is critical to student success. Our at-risk students are afforded online credit recovery, we have STEM classes at every level that rely heavily on technology, and we use a mixture of lab based computers and mobile devices on a robust wireless network to provide the connectivity for a collaborative rich environment, the same type environment our students will have to compete in the workplace. All of our efforts rely on technology infrastructure and bandwidth to provide necessary services. Fees for our annual leased fiber service that provide our students a quality educational experience is \$47,400. Without E-rate that money would necessarily reduce the student services we could afford to provide.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this public notice, it is prudent to remain focused on the fact that E-Rate is a program that works. Any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential and ensuring the FCC remains a good steward of the changes adopted 2014, allowing those changes to progress and play out as intended.

E-Rate played a critical role in the rapid and significant expansion of connectivity in schools, and the 2014 modernization was a much needed update to ensure more schools and libraries are connected to broadband. The E-Rate's investment in Category 2 Wi-Fi and internal connections funding is extremely valuable and could not be replaced by school, district or state funds.

Casey County Schools have all but exhausted the Category 2 funds available to us through the 2014 E-rate modernization. For us, the timing of that ruling was perfect – we had aging network equipment and limited wireless access. Before the 2014 ruling, Category 2 E-rate funds ran out before they could be applied at our discount level, yet we filed every year. The 2014 ruling meant we could take the \$150 per student for Category 2 and replace routing and switching equipment and install a dense wireless network to support a one-to-one initiative. Without that money, we could not have made such great improvement in that short time span.

In closing, I reiterate my district's continued, strong support for and reliance upon the E-Rate program for being able to access and afford the high-speed connectivity that is so central to our students' learning. Thank you for considering these comments.

Sincerely,

*Jerome Cummins*

Jerome Cummins, CIO/DTC